

MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY

INTEROFFICE COMMUNICATION

March 17, 2000

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AIR QUALITY DIV.

TO: Arthur R. Nash Jr., Deputy Director for Programs and Regulations
FROM: Russell J. Harding, Director
SUBJECT: Michigan Environmental Science Board (MESB) Recommendation

In its February 2000 report, entitled "Analysis of the Michigan Department of Environmental Quality's Administered Environmental Standards to Protect Children's Health," the Michigan Environmental Science Board (MESB) recommended that the Department of Environmental Quality (DEQ) increase the DEQ Toxic Steering Group's (Group's) interactions with toxicological, epidemiological, and risk assessment staff from other state departments. I fully support this recommendation to ensure that the DEQ monitors the issue of children's health and incorporates the concepts of mixtures and cumulative risk into the DEQ's regulatory risk assessment process.

Please work with appropriate DEQ staff to implement this recommendation. Up to two representatives each from other state agencies, having the above expertise, should be invited to participate on the Group. At a minimum, representatives from the Department of Community Health and the Department of Agriculture should participate for appropriate children's health-related issues. The Group, chaired by a member of the DEQ, is to be under the direction of the Deputy Director for Programs and Regulations. I would also like the Group to seek outside expertise from both industry and environmental health organizations as needed for specific issues.

The Group's primary charge is to monitor and evaluate the United States Environmental Protection Agency's efforts in the area of children's health, review the latest scientific literature and to incorporate the best available science in the development and review of the DEQ's environmental standards. The Group is to report to me on an annual basis as to their findings and recommendations of actions to be taken by the DEQ to ensure adequate protection of children's health.

On a separate but related issue, I believe that the factors used to develop cleanup criteria used by the DEQ should be considered at the division level, on the basis of the best available science. To ensure that all of the affected divisions and outside parties have input into this process, I am directing that the Group be assigned this responsibility. The factors that should be considered by the Group include, but are not limited to, the relative source contribution factor, the exposure assumptions, the toxicological endpoints, and assumptions concerning the characteristics of soil and weather conditions in Michigan.

Arthur R. Nash Jr.

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I am confident that these actions will improve the DEQ's ability to further ensure protection of public health and the environment. Please keep me apprised of the implementation of this directive.

cc: Gary R. Hughes, Deputy Director for Operations
Lynn Buhl, Director of the Southeast Michigan Offices, DEQ
Keith Harrison, DEQ
G. Tracy Mehan, DEQ
Milt Scales, DEQ
DEQ Division Chiefs